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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Karra Bene Lewis,

Defendant.

Case No.: 2:23-cr-01809-DGC-3

**DEFENDANT'S SENTENCING
MEMORANDUM**

COMES NOW, Defendant, Karra B. Lewis, by and through undersigned counsel, hereby submits this sentencing memorandum to this Honorable Court. Mrs. Lewis pled guilty to Count 46 of the Indictment, Material False Statement During the Purchase of a Firearm, Aid and abet, in in violation of Title 18 U.S.C. §§ 922(a)(6), 924(a)(2) and 2. Sentencing is scheduled before this Court on March 19, 2025. Mrs. Lewis requests a variance from this Court, specifically considering the unique circumstances attributed to the character, background and support presented in this case; and sentence her to a term of incarceration of twelve months and one day and a term of twelve months of supervised release; a term slightly below the Presentence Investigation Report ("PSR") prepared and submitted by U.S. Probation Officer Meredith L. Fast.

MEMORANDUM OF POINTS AND AUTHORITIES

I. Legal Basis

Pursuant to 18 U.S.C. § 3553(a)(2), the Court “shall impose a sentence sufficient, but not greater than necessary, to comply with” the following purposes:

- (A) to reflect the seriousness of the offense, to promote respect for the law, and to provide just punishment for the offense;
- (B) to afford adequate deterrence to criminal conduct;
- (C) to protect the public from further crimes of the defendant;
- (D) to provide the defendant with needed educational or vocational training, medical care, or other correctional treatment in the most effective manner.

In *United States v. Booker*,¹ the United States Supreme Court decided the Constitution mandated that the Sentencing Guidelines are merely advisory. Subsequent decisions by the Supreme Court² have made it clear that after calculating and considering the appropriate range under the Sentencing Guidelines, the Court is free to impose a sentence consistent with the factors set forth in 18 U.S.C. § 3553, but outside the strictures of the Guidelines.

II. Facts of the Case

The Defense agrees, for the most part, with the summation of the facts presented in the PSR. (DOC. 116 (“PSR”) ¶¶ 6 – 23). Mrs. Lewis’s immediate family resides out of State. Her family supports her, and her children rely on her for support.

III. Request for Reasonable Sentence

The Defendant respectfully requests this Court impose a reasonable sentence of an incarceration term less than fifty-one to sixty-three months and three years of supervised release. The PSR recommends eighteen months and in the BOP, Defendant believes a term of twelve months and one day is a reasonable sentence for the following reasons:

- 1) Mrs. Lewis is before this Court on her first adult criminal matter within the United States.

¹ 543 U.S. 220, 125 S.Ct. 738 (2005).

² See *Rita v. United States*, 551 U.S. 338, 127 S. Ct. 2456 (2007); *Gall v. United States*, 552 U.S. 38, 128 S. Ct. 586 (2007), and *Kimbrough v. United States*, 552 U.S. 85, 128 S.Ct. 558 (2007).

- 1 2) Mrs. Lewis was an average participant in this matter, only participating at the behest
2 of her Husband and Co-Defendant, Kevin Lewis.
- 3 3) Mrs. Lewis is currently employed full-time as a workflow coordinator at the law
4 firm of Orrick, Herrington, and Sutcliffe in Texas. Mrs. Lewis works very hard
5 supporting her family as the only bread winner.
- 6 4) Looking at the situation and the factors outlined in 18 U.S.C § 3553(a)(2), a term of
7 incarceration of twelve months and one day and twelve months of supervised
8 release reflects the seriousness of what occurred, would serve as a deterrent to
9 others and Mrs. Lewis, and would further protect the public.
- 10 5) Such a sentence is in accord with the factors enumerated above and would allow
11 Mrs. Lewis the ability to set an example for her family by taking responsibility for
12 her actions and allowing Mrs. Lewis to continue pursuing her goals and grow in her
13 career. Mrs. Lewis is an educated individual who enjoys working and spending
14 time with her family. She is extremely committed to remaining crime free and
15 becoming a prosperous professional. Lastly, Mrs. Lewis understands the
16 seriousness of her actions, the impact firearms and weapons (specifically in the
17 hands of convicted felons) have on the community, and her poor decisions leading
18 to his interaction with criminal society—ultimately leading to her arrest and
19 charges.
- 20 6) Finally, Mrs. Lewis wasn't on the path or trajectory directing her towards the life of
21 criminal activity; however, she followed her husband's requests unfortunately,
22 jeopardizing her family in the process. Suffice it to say, Mrs. Lewis regrets her
23 choice of engaging in any sort of criminal activity for her husband and will abstain
24 from ever committing crimes again.

25 **III. Conclusion**

26 In summation, sentencing Mrs. Lewis to a term of incarceration of twelve months and
27 one day with a twelve month term of supervised release is an appropriate sentence for this
28 matter. It also serves as a deterrent to both Mrs. Lewis and others in her situation. More
significantly, it will serve as just punishment for Mrs. Lewis, driving the importance that she

1 will know she cannot partake in future felonious activities without the guaranteed possibility of
2 going to prison for a very long time. Mrs. Lewis promises to remain law abiding and will never
3 come before this Court for any felonious activity in her future. Going forward, she wishes to
4 remain a hardworking, loving and caring/supporting loved one to her family.

5 Respectfully Submitted March 13, 2025.

6 Faussette & Faussette, PLLC

7 By: /s/Jacob Faussette
8 /s/Jacob Faussette
9 Attorney for Defendant
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12 **CERTIFICATE OF SERVICE**

13 I hereby certify that on the 13th day of March, 2025, I electronically transmitted the attached
14 document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice
15 of Electronic Filing to the following CM/ECF registrants:

16 The Honorable District Court Judge David G. Campbell

17 Jacquelin Nan Schesnol, Assistant United States Attorney

18 Karra Lewis
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21 By: /s/ Char Snyder
22 Char Snyder
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